

**BEFORE THE
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, DC**

Petition of)	
ALASKA AIRLINES, INC.)	
to extend Exemption No. 17617)	
)	
)	
)	

Docket FAA-2017-0793

DATED: May 20, 2022

PETITION OF ALASKA AIRLINES, INC. TO EXTEND EXEMPTION NO. 17617

Pursuant to 14 C.F.R. § 11.81, Alaska Airlines, Inc. ("Alaska"), a Part 121 operator, hereby petitions to extend Exemption No. 17617 to allow Alaska to continue to operate Airbus A320 and A321 aircraft with survival kits that are remotely stowed from required life rafts. Alaska requests an extension for a period of five years, commencing November 30, 2022 and ending November 30, 2027.

Section of Title 14 of the Code of Federal Regulations for Which an Exemption is Requested:

14 C.F.R. § 121.339(c), which states that "[a] survival kit, appropriately equipped for the route to be flown, must be attached to each required life raft."

Requested Relief:

Alaska requests an extension to Exemption No. 17617, dated October 23, 2017 and that is set to expire on November 30, 2022, from the requirement to comply with 14 C.F.R. § 121.339(c).

Specifically, on A320 and A321 aircraft operated by Alaska, escape slides also serve as life rafts, which are required under 14 C.F.R. § 121.339(c) to have attached survival kits. However, the storage space of the door compartments containing these escape slides/life rafts on the A320 and A321 is limited, and the survival kits required for ditching/extended overwater approval will not fit into the same compartment as the escape slides/life rafts. An extension to Exemption No. 17617 would allow Alaska to continue stow these survival kits separately from the escape slides/life rafts in another location in close proximity to the location where the rafts are stowed.

Background Information in Support of Alaska's Petition:

Alaska requests an extension to Exemption No. 17617¹ relating to survival kits. On June 3, 2010, the FAA issued Equivalent Level of Safety ("ELOS") Memo #TD008391B-T-CI-14 relating to 14 C.F.R. § 25.1415(c) and applicable to A318, A319, A320, and A321 aircraft, which allows survival kits to be stowed near the required floor level exits on these aircraft due to the space constraints of the slide bustles. The location of these survival kits make them immediately available to flight attendants seated at the exit. This ELOS is noted in the Type Certificate Data Sheet (TCDS) number A28NM, Rev 20. The ELOS provided by ELOS Memo #TD008391B-T-CI-14 is the same ELOS provided in the ELOS Memo issued by the FAA to Boeing in October 1992 for the Boeing 757-200 aircraft equipped with slide/rafts, as well as the ELOS provided in the ELOS Memo issued by the FAA on August 5, 1998, for the Boeing 757-300 series aircraft.

In addition, the FAA has previously issued exemptions as well as granted petitions to extend such exemptions from 14 C.F.R. § 121.339(c) applicable to A320 and A321 in circumstances similar in all material respects to the relief requested herein, and has found that exemptions from 14 C.F.R. § 121.339(c) would not adversely impact safety based on the safety analysis documented within the ELOS Memo #TD008391B-T-CI-14.²

Request to Operate Under the Exemption Outside the U.S.:

In accordance with 14 C.F.R. §§ 11.81(h) and 11.83, Alaska requests that it be permitted to continue to exercise the privileges of its exemption from 14 C.F.R. § 121.339(c) outside the United States, if necessary. Alaska operates international air service, including flights to and from Mexico, Belize, and Canada. The reasons for Alaska's requested exemption discussed herein would apply equally to use of the exemption privileges on international flights.

Request for Expedited Consideration:

Alaska requests that, as part of this petition to extend Exemption No. 17617, the public comment period be waived as provided in 14 C.F.R. § 11.87. The requested relief would not set a precedent and is identical to exemptions and associated extension requests

¹ On October 23, 2017, the Federal Aviation Administration ("FAA") granted Virgin America Inc. ("Virgin America") an exemption from 14 C.F.R. § 121.339(c) to allow Virgin America to operate Airbus A319, A320, and A321 aircraft with survival kits remotely stowed from slide/rafts. Since then, the FAA has issued a single operating certificate to Alaska Airlines, Inc. and/or Virgin America Inc. Alaska is petitioning for extension of Exemption No. 17617 only with respect to its A320 and A321 aircraft because Alaska no longer operates the A319 aircraft.

² See Petition of American Airlines, Inc., FAA Exemption No. 17335, May 19, 2017 (Docket FAA-2016-8366); Petition of Delta Air Lines, Inc., FAA Exemption No. 17291, March 31, 2017 (Docket FAA-2016-5244); Petition of American Airlines, Inc., FAA Exemption No. 17335A, April 28, 2022 (Docket FAA-2016-8366); Petition of Delta Air Lines, Inc., FAA Exemption No. 17291A, March 28, 2022 (Docket FAA-2016-5244).

previously granted by the FAA to other operators, including American Airlines and Delta Air Lines.³ Granting Alaska's petition to extend Exemption No. 17617 would provide the same relief as granted by the FAA when it issued Exemptions 17335A and 17291A.

No Adverse Effect on Public Safety and the Public Interest:

The FAA has previously found that grants of similar exemptions and associated petitions for extension were in the public interest and provided equivalent levels of safety. These findings, which warranted the grant of exemptions for Boeing 757-200 and 757-300 series aircraft and other carriers' A319, A320, and A321 aircraft, remain valid and apply to Alaska's petition to extend Exemption No. 17617. Alaska's Inflight Manual continues to contain procedures for the use of these survival kits and escape slides/life rafts in the event of ditching for the A320 and A321 aircraft.

Summary for Federal Register:

A summary of the request made herein is attached below, as required under 14 C.F.R. § 11.81(f). However, Alaska submits that good cause exists for not publishing a summary of this petition in the *Federal Register*, as the requested exemption is not precedential, and any delay in acting on this petition would be detrimental to Alaska.

SUMMARY OF PETITION

Petitioner: Alaska Airlines, Inc.

Regulations affected: 14 C.F.R. § 121.339(c)

Description of Relief Sought: Petition to Extend Exemption No. 17617

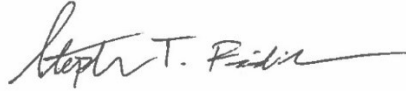
On the A320 and A321 aircraft, escape slides also serve as life rafts. FAA regulations require that survival kits, appropriately equipped for the route to be flown, be attached to each required life raft. However, the volume of the door compartments on A320 and A321 aircraft are limited, and survival kits required for ditching/extended overwater approval will not fit into the same compartment as the escape slide/life rafts. Alaska is petitioning to extend previously granted Exemption No. 17617, which provides relief from 14 C.F.R. § 121.339(c) in order to continue to stow A320/A321 survival kits in a different location within close proximity to the escape slides/life rafts.

Conclusion:

Based on the information provided herein, Alaska respectfully requests that the FAA extend Exemption No. 17617 for an additional five years relating to requirements in 14 C.F.R. § 121.339(c) with respect to Alaska's A320 and A321 aircraft.

³ See footnote 2 above.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Stephen T. Fairchild", written over a light gray rectangular background.

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